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Presentment Date and Time: December 26, 2017 at 12:00 p.m. (Eastern)

Counsel to Pregame LLC and Randall James Busack

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:
	:
	: Chapter 11
Gawker Media LLC, <i>et al.</i> ,	:
	:
	: Case No. 16-11700 (SMB)
	: (Jointly Administered)
Debtors.	:
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**OBJECTION TO PROPOSED ORDER OF
GIZMODO MEDIA GROUP, LLC [DKT. NO. 1065]
AND PLAINTIFFS' PROPOSED COUNTER-ORDER**

Pregame LLC d/b/a Pregame.com ("**Pregame**") and Randall James Busack, professionally known as RJ Bell ("**Bell**," and together with Pregame, "**Plaintiffs**"), by and through their undersigned counsel, Golenbock Eiseman Assor Bell & Peskoe LLP, hereby (i) file this objection (the "**Objection**") to the Notice of Settlement of an order (the "**Proposed Order**") [Dkt. No. 1065] by Gizmodo Media Group, LLC ("**Gizmodo**") with respect to the Motion to Enforce the Sale Order and to Bar Certain Plaintiffs from Prosecuting their State Court Action dated August 21, 2017 [Dkt. No. 985] (the "**Motion**"), and (ii) propose the counter-order annexed hereto as Exhibit A (the "**Proposed Counter-Order**").

1. On December 17, 2017, the Court issued its Memorandum Decision Regarding Motion to Enforce the Sale Order of this Court dated December 17, 2017 [Dkt. No. 1063] (the "**Decision**"). The basic holding of the Decision is contained in the final paragraph thereof.

2. Plaintiffs' Proposed Counter-Order provides that the Motion is granted in part and denied in part "in accordance with and for the reasons set forth in the Decision." Gizmodo's Proposed Order adds to this a paraphrase of the language in the last paragraph of the Decision that implements the "granted in part" portion of the holding but leaves out the balance of the last paragraph, which, *inter alia*, implements the "denied in part" portion of the holding.¹

3. Plaintiffs respectfully submit that letting the Decision speak for itself is a simpler and more fair approach, which is reflected in the Proposed Counter-Order. To the extent, however, that any of the last paragraph of the Decision is to be included in the order, then the entire last paragraph should be quoted in the order.

WHEREFORE, Plaintiffs respectfully request that this Court (i) enter the Proposed Counter-Order and (ii) provide such other relief as is just.

Dated: New York, New York
December 22, 2017

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By: /s/ Jonathan L. Flaxer
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¹ Annexed as Exhibit B hereto is a comparison between the Proposed Order and the Proposed Counter-Order.